



School District of Philadelphia
Office of Environmental Management & Services
440 North Broad Street
Philadelphia, PA 19130
(215) 400-4750

Transmitted via Electronic Mail

Ms. Kyla L. Townsend-McIntyre
U.S. Environmental Protection Agency, Region III
Pesticides/Asbestos Programs and Enforcement Branch (3WC32)
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Self Disclosure Agreement - AHERA
Morton Elementary School ULCS #1380

Dear Ms. Townsend-McIntyre

As part of the School District of Philadelphia agreement, effective March 9, 2007 and amended January 18, 2008 with the United States Environmental Protection Agency (EPA), this letter is intended to transmit and certify the Corrective Action Plan (CAP) for the Morton Elementary School.

This Corrective Action Report was written in accordance with the above noted agreement and the "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Federal Register 19618 (4/11/00) (the Policy).

As the Responsible Official, I hereby certify that the attached report entitled *CAP – Morton Elementary School ULCS #1380* submitted to EPA is true, accurate and complete in the form set forth in 40 C.F.R. § 270.11(d).

If you have any questions or comments please feel free to contact me or Ms. Elizabeth Gutman, Esq.

Sincerely,

A handwritten signature in cursive script, reading "Francine Locke".

Francine Locke, MS
Director, Environmental Management & Services

Attachment 1 – *CAP – Morton Elementary School ULCS #1380*

SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN
Updated as of: June 17, 2008

Facility Name: Morton Elementary School #1380
Facility Address: 2501 South 63rd Street, Philadelphia, PA 19142
Date of Audit: 04/30/08
Date CAP Due to EPA: 6/29/08

Finding Number	Regulatory Citation	Finding	Corrective Action	Corrective Action Status (include date when closed)	Preventative Measure	Preventative Measures Status (include date when closed)	Extension Filed (Y/N)	Exhibit Reference	Approximate Cost to Close Finding	Potential Reduction of Pollutants *INCLUDE AMT OF OIL
ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart E										
1	(40 CFR § 763.85(b))	The school is required to complete Three Year Re-inspections. Minor data gaps were identified following the 1998 and 2004 Three Year Re-inspections, ranging from 1 - 3 months.	The school must complete the Re-inspections every 3 years. This is a historical finding as the school can not complete missing data gaps.	Historical finding. Corrective Action can not be completed.	Implement the schedule and track the Three Year Re-inspection in a compliance calendar.	In Progress - A draft compliance calendar was created by URS for tracking the Three Year Re-inspection and is currently being reviewed by the School District.	N	1	N/A	Recordkeeping violation
2	(40 CFR § 763.85(b)(1)(vii))	The regulations require that the Three Year Re-inspections records be updated within 30 days of the inspection. The most recent Re-inspection Report is dated November 2006 and was available for review at the central file and the school building, however it was recently printed/distributed and was not completed within the required 30 day time frame from the inspection date in November 2006.	The Three Year Re-inspection records must be updated within 30 days of the actual inspection. This is a historical finding.	Historical finding. Corrective Action can not be completed.	Implement and track the Re-inspection date in a compliance calendar so that the 30 day update can be tracked by the personnel in the central office for the next Three Year Re-inspection in 2009.	In Progress - A draft compliance calendar was created by URS for the 30 day tracking of the Three Year Re-inspections and is currently being reviewed by the School District.	N	2	N/A	Recordkeeping violation
3	(40 CFR § 763.94)(d)	The school is required to complete Six Month Periodic Surveillance Inspections. Varied data gaps exist between the Six Month Periodic Surveillance Inspections 1989-2004, ranging from 1-19 months.	The school must complete Periodic Surveillance Inspections every 6 months. This is a historical finding as the school can not complete past missed inspections.	Historical finding. Corrective Action can not be completed.	Implement the schedule and track the Six Month Periodic Surveillance Inspection in a compliance calendar.	In Progress - A draft compliance calendar was created by URS for tracking the Six Month Inspections and is currently being reviewed by the School District.	N	3	N/A	Recordkeeping violation

School District of Philadelphia
Asbestos Hazard Emergency Response Act (AHERA)
Compliance Audit

Principal Interview Form

The School District of Philadelphia (School District) and the U.S. Environmental Protection Agency, Region III (EPA) entered into a Self-Audit/Self Disclosure Agreement. The purpose of the agreement is to gauge the School District's compliance with the Asbestos Hazard Emergency Response Act (AHERA) requirements for your school/ facility.

The School District obtained the services of URS Corporation (URS) to conduct the AHERA environmental compliance audit. The audit will focus on the compliance of general information, inspections and reinspections, response actions, operations and maintenance, periodic surveillance, and notifications. This document acknowledges that all environmental documents relevant to the building asbestos management plan have been made available to URS at the time of the audit.

School/ Facility:	Morton Elementary School #1380
Address:	2501 South 63rd Street
Date of Audit:	4/30/08

School Principal:

Print Name: Kevin E. King

Sign Name: Kevin E. King

Date: 4-30-08